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12 Attorneys for Plaintiff
13 VERIGY US, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 VERIGY US, INC, a Delaware Corporation

18 Plaintiff,

19 vs.

20 ROMI OMAR MAYDER, an individual;
21 WESLEY MAYDER, an individual; SILICON
22 TEST SYSTEMS, INC., a California Corporation;
23 and SILICON TEST SOLUTIONS, LLC, a
24 California Limited Liability Corporation,
25 inclusive,

26 Defendants.

Case No. C07 04330 RMW (HRL)

**PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Ronald M. Whyte
Ctrm: 6

1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Plaintiff Verigy U.S., Inc. ("Plaintiff"
2 or "Verigy") requests that the following materials be filed under seal, as they contain confidential
3 information that is protected by the Stipulated Protective Order entered by the Court on August
4 29, 2007. The documents submitted under seal include:

- 5 1. Portions of the Corrected Declaration of Wei Wei and Exhibits D through I.

6 These materials (hereafter "the Materials") each disclose information that has been
7 designated as "Highly Confidential—Attorneys' Eyes Only" or "Confidential by the parties under
8 the protective order, without objection to those designations (although Verigy reserves its rights to
9 challenge such designations pursuant to the Stipulated Protective Order). Although the
10 information in the Materials has been designated as protected from disclosure under the Protective
11 Order, Verigy relies on this information in support of its Motion to Compel. The parties'
12 confidentiality interest therefore overcomes the right of public access to the record, as a substantial
13 probability exists that the parties' overriding confidentiality interest will be prejudiced if the
14 record is not sealed. Further, the proposed sealing is narrowly tailored and no less restrictive
15 means exist to achieve this overriding interest

16 Pursuant to Local Civil Rule 79-5(b)-(c), Verigy therefore lodges the Materials with this
17 Court, and respectfully requests leave to file the aforementioned documents under seal.

18 Respectfully submitted.

19 Dated: November 19, 2007

BERGESON, LLP

20 By: /s/
21 Melinda M. Morton
22 Attorneys for Plaintiff
23 VERIGY US, INC.
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